

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

STEVE TEIXEIRA,

Plaintiff,

v.

MOZILLA CORPORATION a.k.a. M.F.  
Technologies, a California corporation;  
MOZILLA FOUNDATION, a California public  
benefit corporation; LAURA CHAMBERS and  
her marital community; WINIFRED MITCHELL  
BAKER and her marital community, and DANI  
CHEHAK and her marital community.

Defendants.

Case No. 2:24-cv-1032

**DECLARATION OF ANTHONY  
TODARO IN SUPPORT OF  
REMOVAL**

I, Anthony Todaro, declare as follows:

1. I am a partner at the law firm DLA Piper LLP (US) and attorney of record for Defendants MOZILLA CORPORATION a.k.a M.F. Technologies (“Mozilla”), LAURA CHAMBERS, WINIFRED MITCHELL BAKER, and DANI CHEHAK (collectively “Defendants”). I am admitted to practice before this Court. Except as otherwise indicated, I have personal knowledge of the facts set forth in this Declaration and, if called upon to do so, could and would testify competently to them.

2. On May 13, 2024, Plaintiff Steve Teixeira (“Plaintiff”) sent Mozilla a demand letter stating that Plaintiff’s estimated damages would be in the mid-eight figure range.

3. Mozilla was served with Plaintiff’s complaint on June 13, 2024.

4. I have primarily practiced in the Seattle area for over 20 years. During this time, I have

1 routinely defended employment discrimination and retaliation actions. I am familiar with claims  
2 and awards for attorneys' fees for these types of cases. It is routine for Plaintiff's counsel to spend  
3 over 100 hours litigating similar labor and employment cases and the amount of the claims to  
4 exceed the amount underlying the claims. Based on that experience, discovery and settlement  
5 discussions almost universally result in plaintiffs seeking more than \$75,000 when attorneys' fees  
6 are taken into account.

7 5. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true  
8 and correct.

9 Executed at Seattle, Washington, this 12th day of July, 2024.

10 s/ Anthony Todaro

11 Anthony Todaro, WSBA No. 30391  
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**CERTIFICATE OF SERVICE**

I hereby certify that on July 12, 2024, I caused a true and correct copy of the foregoing document to be served on the parties listed below in the manner indicated:

Mathew L. Harrington Amy K. Alexander STOKES LAWRENCE, P.S. 1420 5 <sup>th</sup> Avenue, 30 <sup>th</sup> Floor Seattle, WA 98101 E-mail: <a href="mailto:mat.harrington@stokeslaw.com">mat.harrington@stokeslaw.com</a> <a href="mailto:amy.alexander@stokeslaw.com">amy.alexander@stokeslaw.com</a>  <i>Attorneys for Plaintiff Steve Teixeira</i>	<input type="checkbox"/> Via Hand Delivery <input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via E-mail <input checked="" type="checkbox"/> Via the Court's E-Service Device
Darren Feider, WSBA No. 22430 SEBRIS BUSTO JAMES P.S. 15375 SE 30th Pl., Suite 310 Bellevue, Washington 98007 T: 425 454-4233 F: 425 453-9005 E-mail: <a href="mailto:dfeider@sbj.law">dfeider@sbj.law</a>  <i>Attorneys for Defendant Mozilla Foundation</i>	<input type="checkbox"/> Via Hand Delivery <input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via E-mail <input checked="" type="checkbox"/> Via the Court's E-Service Device

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Dated this 12th day of July, 2024

s/ Jacey Bittle  
Jacey Bittle, Legal Administrative Assistant